

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	<b>NO. 3:24-cr-00189</b>
<b>v.</b>	)	<b>JUDGE CRENSHAW</b>
	)	
<b>DAVID AARON BLOYED</b>	)	

**MOTION TO EXCLUDE CLIPS OF MR. BLOYED'S TRANSPORT FROM  
ARREST SITE TO JAIL**

On April 21, 2025, the Government filed a proposed exhibit list. (D.E. 58) Proposed Exhibit 37 is described as “Clips of Bloyed’s Transport from Arrest Site to Jail.” (D.E. 58) Defense counsel is unsure which clips the Government intends to introduce. The defense submits a transcript of the entire recording along with this motion. The recording consists primarily of statements by Mr. Bloyed in which he describes a vast Jewish conspiracy to control the world and makes profane, inflammatory references to various racial and ethnic groups. The Government did not give notice of its intent to introduce this recording in the 404(b) notice it filed on March 4, 2025. (D.E. 42) There is nothing relevant to this case in the recording and it is therefore inadmissible under Rule 402 of the Federal Rules of Evidence. Because of Mr. Bloyed’s frequent use of profanity and racial epithets and his emphatic expression of antisemitic and racist sentiments, it is inadmissible under Rule 403, as any conceivable probative value the recording has is substantially outweighed by the danger of unfair prejudice. It is inadmissible under Rule 404(b) because his use of racist and antisemitic language constitutes a wrong within the meaning of that rule.

Respectfully submitted,

/s/ Will Allensworth

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2025, I electronically filed the foregoing Motion to Exclude Clips of Mr. Bloyed's Transport from Arrest Site to Jail with the clerk of the court by using the CM/ECF system, which will send a notice of Electronic Filing to: Joshua Kurtzman and Philip Wehby, Assistant United States Attorneys, 719 Church Street, Suite 3300, Nashville, Tennessee 37203.

/s/ Will Allensworth

WILL ALLENSWORTH